

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

In re:) **In Proceedings Under**
Robert J. Ambruster, Inc.) **Chapter 11, Subchapter V**
)
Debtor.) **Case No. 20-44289**
)
) **Motion # _____**

**MOTION TO WITHDRAW AS COUNSEL
FOR DEBTOR, ROBERT J. AMBRUSTER, INC.**

Comes Now Angela Redden-Jansen, Counsel for Debtor, Robert J. Ambruster, Inc., and
for her Motion to Withdraw states as follows:

1. Debtor filed for relief under Chapter 11 of the United State Bankruptcy Code on September 3, 2020.
2. Jurisdiction is proper pursuant to 28 U.S.C. §§ 157 and 1334.
3. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).
4. Venue over Debtor's Chapter 11 case and this Motion are proper pursuant to 28 U.S.C. §§ 1408 and 1409.
5. Counsel brings this Motion pursuant to L.R. 2091.
6. The following matters are currently set for hearing:
 - a. Deborah Drace's ("Deborah") Motion for Leave to File Late Proof of Claim is scheduled for March 31, 2021 at 10:00 am;
 - b. The court was to issue an order regarding setting confirmation; however, a Motion has been filed contemporaneously herewith to continue confirmation; and
 - c. Counsel is aware that there are numerous motions that have been filed by Deborah and Jeffrey Mize ("Mize"), but she is unaware of any other pending Motions scheduled for

hearing.

7. There is an internal dispute over the management and control of Debtor.
8. Deborah purports to be the President of Debtor.¹
9. Deborah terminated Counsel's service and provided her with the option to file a Motion to Withdraw or she would file a motion to have counsel removed.
10. Mize had demanded counsel withdraw if she is unable to comply with his orders.
11. Counsel does not need to be asked more than once to withdraw and is filing this motion at the specific direction of Deborah.
12. Notwithstanding whether Deborah or Mize has the authority to terminate Counsel on behalf of Debtor, Counsel would still be seeking to withdraw.
13. Mize is relentlessly issuing directives to Counsel on how to represent Debtor, including but not limited to filing documents he prepared. (Exhibit 1, pg. 3).
14. Counsel cannot condone nor can she participate in the unauthorized practice of law.
15. As long as Deborah purports to be in control of Debtor and Mize continues to issue dictates, it is impossible for Counsel to represent Debtor.
16. Deborah and Mize's conduct has so poisoned the possibility of any attorney client relationship making it is impossible for Counsel to perform the task necessary to represent Debtor.
17. Mize has threatened counsel on numerous occasions and he continues to threaten and harass Counsel. (Exhibit 1).
18. Mize's inappropriate behavior is escalating in type, severity and frequency of the threats being made. (Exhibit 1).

¹ Counsel's Motion to Withdraw is not intended to be construed by this Court or any other court as confirmation that Deborah is the president of Debtor. Counsel does not know who is the president of Debtor.

19. Up and until recently, Mize's threats and insults, while irritating and childish, have been an innocuous attempt to coerce Counsel to follow his orders. (Exhibit 1)

20. Deborah and Mize's most recent conduct in Court on March 9, 2021 has caused Counsel concern.

21. Counsel could ignore Mize's past threat that "AGH is coming for you..." coupled with a picture of himself. (Exhibit 1, pg. 2).

22. Counsel could ignore Mize's threats of filing suit against counsel for "lawyer misconduct," "legal malpractice" or whatever. (Exhibit 1).

23. Counsel could ignore Mize's insults and the constant questioning of her competency and motives. (Exhibit 1).

24. On March 11, 2021, after Mize and Deborah were asked to leave counsel's office, for the second time, and never return, Mize sent counsel an email declaring "[m]ake no mistake I too have power outside of courthouse and inside courthouse (sic). It is apparently obvious you will need to learn this the hard way." (Exhibit 1, pg. 1).

25. Mize's March 11, 2021 email, can only be interpreted as a threat against Counsel's person, especially in light of his and Deborah's conduct in court on March 9, 2021 and his past felony convictions.

26. Counsel can no longer represent Debtor due to the hostile and dangerous environment created by both Deborah and Mize.

27. The constant threats and harassment by Mize and Deborah are intolerable.

28. This Court has the authority to pursuant to L.R. 2091(A)(1) to grant Counsel's motion immediately without necessity of a hearing.

WHEREFORE, Angela Redden-Jansen respectfully requests that this Court enter an immediate order granting her Motion to Withdraw and such other and further relief as this Court may

deem just and proper.

RESPECTFULLY SUBMITTED,

Dated: March 15, 2021

/s/ Angela Redden-Jansen
Angela Redden-Jansen, #42684
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Certificate of Service

The undersigned hereby certifies that on March 15, 2021, the foregoing was filed electronically with the Clerk of the Court to be served upon all parties that have requested electronic notice, the Chapter 11 Trustee and US Trustee, and by first class mail postage prepaid to all parties listed below:

/s/Angela Redden-Jansen

Angela Redden-Jansen 3350 Greenwood Blvd. Maplewood, MO 63143
Robert J. Ambruster, Inc. 6633 Clayton Road Saint Louis, MO 63117
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Jeffrey M Mize 7635 W Shore Dr Egg Harbor, WI 54209
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Batesville Casket Company PO Box 644559 Pittsburgh, PA 15264-4559
Chase Card Member Services PO Box 6294 Carol Stream, IL 60197-6294
Citizens National Bank 7305 Manchester Rd. Saint Louis, MO 63143
Criswell Casket Company 2000-2010 Exchange Dr Saint Charles, MO 63303
Division of Employment Securities PO Box 3100 Jefferson City, MO 65102
JS Paluch Co., Inc. PO Box 2703 Schiller Park, IL 60176
LPI PO Box 510817 New Berlin, WI 53151-0817
Missouri Department of Labor& Ind. Rel. Division of Employment Security Jefferson City, MO 65104-0059
Missouri Funeral Directors and Embalmers 1757 Woodcliff Dr., Ste 202 Jefferson City, MO 65109
MSD PO Box 437 Saint Louis, MO 63166
Sams Club MC/SYNCB PO Box 960016 Orlando, FL 32896-0016
Spire Drawer 2 Saint Louis, MO 63171 \\\nSt. Louis County Collector of Revenue 41 S. Central Saint Louis, MO 63105
The National Directory of Mortuaries PO Box 73 Chagrin Falls, OH 44022-0073
Travelers Insurance J Thomas Company, Inc. 800 Market ST., Ste. 1655 Saint Louis, MO 63101